

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

NOTICE OF PLAINTIFFS' PROPOSED SCHEDULE

Coalition and Curling Plaintiffs hereby propose the schedule below. Plaintiffs' proposed schedule, which allows for full discovery and trial in early 2020, also includes time for briefing and a hearing on the preliminary injunctions Plaintiffs will be filing with respect to Georgia's continued use of the vulnerable and insecure Direct-Recording Electronic Voting System.

Case Event	Date
Close of Fact Discovery ¹	November 22, 2019 ²

¹ All responses to discovery requests, including production of documents or data in response to requests pursuant to Fed. R. Civ. P. 34, shall be due within 14 calendar days of receipt of any such request. Service of discovery requests and responses may be effected by email on counsel of record for all parties.

² Based on BMD system availability for discovery by no later than September 1, 2019.

Simultaneous Expert Reports	December 6, 2019
Simultaneous Expert Rebuttal Reports	December 20, 2019
Close of Expert Discovery	January 10, 2020
Trial Readiness	February, 2020

Case Event	Date
Plaintiffs' Preliminary Injunction Filings	No later than June 21, 2019
Defendants' Responses to Preliminary Injunctions Due	14 days after Plaintiffs' Filings
Plaintiffs' Preliminary Injunction Replies Due	14 days after Defendants' Responses
Preliminary Injunction Hearing	Week of July 21, 2019

Dated: May 30, 2019

/s/ Cary Ichter
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ Cary Ichter

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CERTIFICATE OF SERVICE

This is to certify that I have this day caused the foregoing to be served upon all other parties in this action by via electronic delivery using the PACER-ECF system.

This 30th day of May 2019.

/s/ Cary Ichter _____
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